

Attorneys for Plaintiff

BCB CHEYENNE LLC d/b/a BISON)
BLOCKCHAIN, a Wyoming limited liability)
Company)
)
Plaintiffs)

Civil No. 23-CV-79

MINEONE WYOMING DATA CENTER, LLC, a Delaware limited liability company; MINEONE PARTNERS LLC, a Delaware limited liability company; TERRA CRYPTO INC., a Delaware corporation; BIT ORIGIN, LTD, a Cayman Islands Company; SONICASH LLC, a Delaware limited liability company; BITMAIN TECHNOLOGIES HOLDING COMPANY, A Cayman Islands company; BITMAIN TECHNOLOGIES GEORGIA LIMITED, a Georgia corporation; and JOHN DOES 1-18, related persons and companies who control or direct some or all of the named Defendants,

Defendants.

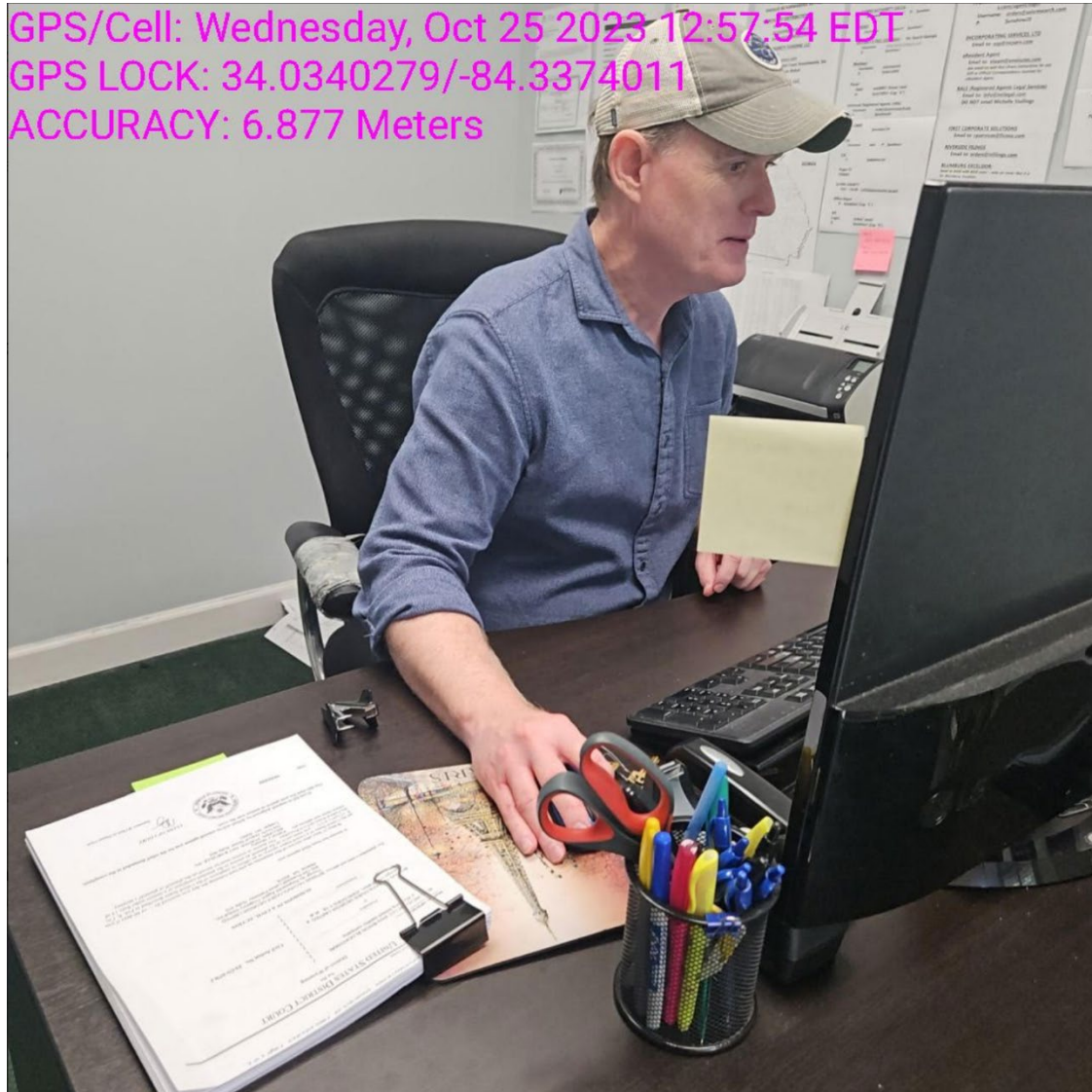
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COMES NOW Plaintiff BCB Cheyenne LLC d/b/a Bison Blockchain, through its counsel, and, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, hereby applies to the Clerk to enter default against Defendant Bitmain Technologies Georgia Limited, a Georgia corporation, for its failure to answer or respond to Plaintiff's First Amended Complaint within twenty-one (21) days of being personally served, in Georgia, with copies of the First Amended Complaint and Summons.

In support of this application, Plaintiff's counsel, Patrick Murphy, shows the Clerk as follows:

1. On September 30, 2023, Plaintiff filed its First Amended Complaint (Doc. 50).
2. Plaintiff's First Amended Complaint added two new Defendants to the case: Bitmain Technologies Georgia Limited, a Georgia corporation, and Bitmain Technologies Holding Company, a Cayman Islands company (Doc. 50).
3. The Clerk's office issued a Praecipe for a Summons to be issued to Defendant Bitmain Technologies Georgia Limited on October 23, 2023.
4. The Georgia Registered Agent for service of process for Bitmain Technologies Georgia Limited is Cogency Global Inc. in Atlanta, Georgia.
5. On October 25, 2023, Plaintiff's Georgia process server, Haile Kahssu, personally served Defendant Bitmain Technologies Georgia Limited by hand-delivering true and correct copies of Plaintiff's First Amended Complaint and Summons to Cogency Global Inc. by presenting these papers to Scott Perkins, an authorized representative of Cogency Global Inc., at its office at 900 Old Rosewell Lakes Parkway, Suite 310, Atlanta, Georgia 30076. The signed and completed "Proof of Service" was filed with this Court on 11/1/2023 (Doc. 63).
6. Additional proof that personal service was made that day upon Cogency Global Inc. representative Scott Perkins is found in the photograph taken by process server Haile Kahssu

that day. After hand-delivering the First Amended Complaint and Summons to Scott Perkins, Mr. Kahssu took Mr. Perkins' photograph with the served papers on Mr. Perkins' desk. The photograph provided by Mr. Kahssu is also stamped with the date, time, and GPS location confirming service on registered agent Cogengy Global Inc.'s process specialist, Scott Perkins. That photograph is produced below.



7. Defendant Bitmain Technologies Georgia Limited had twenty-one (21) days from the date of service on October 25, 2023 to answer or otherwise plead to Plaintiff's First Amended Complaint. *See* Rule 4, Fed. R. Civ. P.

8. The twenty-first day following the October 25, 2023 date of service was November 15, 2023.

9. Defendant Bitmain Technologies Georgia Limited failed to file any Answer or responsive pleading to Plaintiff's First Amended Complaint by November 15, 2023.

10. Consequently, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, the Clerk should now enter default against Defendant Bitmain Technologies Georgia Limited.

11. A proposed ENTRY OF DEFAULT is attached to this application for the Clerk's consideration.

Respectfully submitted this 16th day of November, 2023.

BCB CHEYENNE LLC d/b/a
BISON BLOCKCHAIN,
Plaintiff

By: /s/ Patrick J. Murphy
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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing document was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 16th day of November 2023.

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By: /s/ Patrick J. Murphy
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